

## STATEMENT OF BASIS (AI No. 41239)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122459 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Northshore Chemical, LLC  
61134 St. Tammany Avenue  
Slidell, LA 70460

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Molly Hebert

**DATE PREPARED:** November 16, 2006

### 1. PERMIT STATUS

#### A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A  
NPDES permit expiration date: N/A

C. LPDES permits - LPDES permit effective date: N/A  
LPDES permit expiration date: N/A

D. Date Application Received: October 13, 2006

### 2. FACILITY INFORMATION

#### A. FACILITY TYPE/ACTIVITY - chemical packing and distribution

Northshore Chemical, LLC purchases hydrochloric acid and sodium hypochlorite (bleach) in bulk and stores it in two 10,000 gallon tanks. This bulk material is used to fill 55 gallon poly drums which are then sold. The facility handles approximately 200,000 gallons/yr of hydrochloric acid and 400,000 gallons/yr of sodium hypochlorite.

The bulk storage tanks are located within a cement berm. For safety reasons, a layer of clean water is placed in the berm prior to transferring chemicals to smaller drums. Once filling is completed, the pH is tested and, if necessary, adjusted with sodium bicarbonate and more water. Once the pH is stable, it is held in the berm for 24 hours, checked again and discharged through outfall 001. The facility also has a 1000 gallon industrial sanitary treatment plant that discharges sanitary wastewater through Outfall 002.

#### B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 5169

C. LOCATION - at 61134 St. Tammany Ave, Slidell, St. Tammany Parish  
Latitude 30° 19' 08", Longitude -89° 46' 46"

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: wastewater from contained chemical transfer area and stormwater  
Treatment: neutralization  
Location: at the point of discharge from the concrete berm, prior to mixing with any other  
Flow: 400 GPD  
Discharge Route: to Bayou Vincent via local drainage

#### Outfall 002

Discharge Type: sanitary wastewater  
Treatment: 1000 gallon industrial sanitary treatment plant w/ chlorination  
Location: at the point of discharge from the treatment plant, prior to mixing with any other  
Flow: 55 GPD  
Discharge Route: to Bayou Vincent via local drainage

### 4. RECEIVING WATERS

STREAM - Bayou Vincent via local drainage

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040907

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife

### 5. TMDL STATUS

Subsegment 040907, Bayou Bonafouca, is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/low DO, chlorides, and sulfates. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the chemical packing and distribution point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Chlorides and sulfates are listed as drought-related impacts. The facility does not have the potential to discharge pollutants associated with the sulfate impairment. However, since the facility handles hydrochloric acid and sodium hypochlorite, a Reporting Requirement for chlorides is included in this permit. A BOD<sub>5</sub> limitation placed on the sanitary discharge will address dissolved oxygen concerns.

## **6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

## **7. COMPLIANCE HISTORY/COMMENTS**

1. WQMD – There are no inspections on file for this owner as of December 6, 2006.
2. DMR Review/Excursions – There are no DMRs on file as of December 6, 2006.

## **8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 040907 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

## **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. Public notice published in:

Local newspaper of general circulation  
Office of Environmental Services Public Notice Mailing List

### Rationale for Northshore Chemical, LLC

- Outfall 001** - wastewater from contained chemical transfer area and stormwater (estimated flow is 400 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	--- : Report	*, BPJ
TOC	--- : 50	*, BPJ
Oil & Grease	--- : 15	*, BPJ
Chlorides	--- : Report	*, BPJ
pH	6.0 su – 9.0 su (min) (max)	*, BPJ

**Treatment:** neutralization prior to discharge

**Monitoring Frequency:** monthly

**Limits Justification:** Limits are based on existing permits for similar facilities (LA0059579) and BPJ. The chlorides reporting requirement is included because the facility handles hydrochloric acid and sodium hypochlorite and the receiving stream is impaired for chlorides. The reported values will be used in the TMDL study for this waterbody. Upon completion of the TMDL, the report requirement will either be deleted, or a limit will be imposed.

\* Existing permits for similar outfalls  
su Standard Units

- Outfall 002** – sanitary wastewater (estimated flow is 55 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	--- : Report	LAG530000
BOD <sub>5</sub>	--- : 45	LAG530000
TSS	--- : 45	LAG530000
Fecal Coliform Colonies/100 ml	--- : 400	LAG530000
pH	6.0 su – 9.0 su (min) (max)	LAG530000

**Treatment:** mechanical treatment plant with chlorination

**Monitoring Frequency:** semiannually

**Limits Justification:** Limits are based on Schedule B of the Class I Sanitary General Permit (LAG530000) and BPJ.

#### **STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

Per LAC33:IX.2511.B.14.k, stormwater discharges from facilities classified as SIC Code 5169 are not considered to be stormwater associated with industrial activity. However, a SWP3 is included in this permit as there is the potential for stormwater contamination from processes such as loading and unloading chemicals.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).